

1 TIMOTHY W. BURNS (admitted *pro hac vice*)

Wisconsin Bar #1068086

2 JESSE J. BAIR (admitted *pro hac vice*)

Wisconsin Bar #1083779

3 **BURNS BAIR LLP**

10 E. Doty Street, Suite 600

4 Madison, Wisconsin 53703-3392

Telephone: (608) 286-2302

5 Email: tburns@burnsbair.com

jbair@burnsbair.com

6 *Special Insurance Counsel to The Official Committee*  
7 *of Unsecured Creditors*

8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 *In re:*

12 THE ROMAN CATHOLIC ARCHBISHOP  
13 OF SAN FRANCISCO,

14 Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

**COVER SHEET TO SIXTH INTERIM FEE  
APPLICATION OF BURNS BAIR LLP AS  
SPECIAL INSURANCE COUNSEL TO THE  
OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR ALLOWANCE AND  
PAYMENT OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD OF JUNE 1, 2025 THROUGH  
SEPTEMBER 30, 2025**

Judge: Hon. Dennis Montali

Date: December 4, 2025

Time: 1:30 p.m. (Pacific Time)

Place: United States Bankruptcy Court

450 Golden Gate Avenue

San Francisco, California 94102

Objection Deadline: November 13, 2025

1	Name of Applicant:	Burns Bair LLP
2	Name of Client:	The Official Committee of Unsecured Creditors
3	Time period covered by this application:	June 1, 2025 – September 30, 2025
4	Total compensation sought this period:	\$226,738.00
5	Total expenses sought this period:	\$11,812.10
6	Petition date:	August 21, 2023
7	Retention date:	October 19, 2023
8	Date of Order approving employment:	November 29, 2023
9	Total compensation allowed by interim order to date:	\$760,217.00
10	Total expenses allowed by interim order to date:	\$28,564.06
11	Total compensation approved by interim order to date:	\$760,217.00
12	Total expenses approved by interim order to date:	\$28,564.06
13	Blended rate in the Interim Application for all attorneys:	\$809.23
14	Blended rate in the Interim Application for all timekeepers:	\$798.65
15	Fees sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$106,176.00
16	Expenses sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$7,846.59
17	If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
18	If applicable, difference between fees budgeted and compensation sought for this period:	N/A
19	Number of professionals included in this application:	6
20	Number of professionals billing fewer than 15 hours to the case during this period:	3
21	Are any rates higher than those approved or disclosed at retention?	No
22	Interim or Final:	Interim
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## SUMMARY OF MONTHLY FEE STATEMENTS

Date Filed & Docket	Period Covered	Total Compensation and Expenses Incurred		Total Amount Requested with Monthly Fee Statement		Total Amount Paid to Date	
		Fees	Expenses	Fees (80%)	Expenses (100%)	Fees (80%)	Expenses (100%)
7/30/2025 [Dkt. 1277]	6/1/2025 – 6/30/2025	\$54,726.00	\$4,164.45	\$43,780.80	\$4,164.45	\$43,780.80	\$4,164.45
9/2/2025 [Dkt. 1319]	7/1/2025 – 7/31/2025	\$77,994.00	\$3,682.14	\$62,395.20	\$3,682.14	\$62,395.20	\$3,682.14
9/30/2025 [Dkt. 1366]	8/1/2025 - 8/31/2025	\$56,671.00	\$0	\$45,336.80	\$0	\$0	\$0
To be filed	9/1/2025 – 9/30/2025	\$37,347.00	\$3,965.51	\$29,877.60	\$3,965.51	\$0	\$0
Total:		\$226,738.00	\$11,812.10	\$181,390.40	\$11,812.10	\$106,176.00	\$7,846.59

Summary of Any Objections to Monthly Fee Statements: None

Compensation and Expenses Sought in this Interim Fee Application Not Yet Paid: \$124,527.51

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10 *In re:*

Case No. 23-30564

11 THE ROMAN CATHOLIC ARCHBISHOP  
12 OF SAN FRANCISCO,

Chapter 11

13 Debtor and Debtor in Possession.

**SIXTH INTERIM FEE APPLICATION OF  
BURNS BAIR LLP AS SPECIAL  
INSURANCE COUNSEL TO THE  
OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS FOR ALLOWANCE AND  
PAYMENT OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD OF JUNE 1, 2025 THROUGH  
SEPTEMBER 30, 2025**

17 Judge: Hon. Dennis Montali

18 Date: December 4, 2025

19 Time: 1:30 p.m. (Pacific Time)

Place: United States Bankruptcy Court

450 Golden Gate Avenue

San Francisco, California 94102

20 Objection Deadline: November 13, 2025

21 Burns Bair LLP (the “**Applicant**” or “**Burns Bair**”), special insurance counsel to the  
22 Official Committee of Unsecured Creditors (the “**Committee**”) of the Roman Catholic  
23 Archbishop of San Francisco (the “**Debtor**”) in the above captioned chapter 11 case (the  
24 “**Chapter 11 Case**”) hereby submits its Sixth Interim Fee Application (the “**Interim**  
25 **Application**”), for an order, in substantially the form attached hereto as **Exhibit A**, pursuant to  
26 sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016  
27 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the United States  
28 Trustee Appendix B Guidelines for Reviewing Applications for Compensation and

1 Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11  
2 Cases, effective November 1, 2013 (the “**U.S. Trustee Guidelines**”), the *Guidelines for*  
3 *Compensation and Expense Reimbursement of Professionals and Trustees* (the “**Northern**  
4 **District Guidelines**”), and the Local Bankruptcy Rules for the Northern District of California  
5 (the “**Local Rules**”), and the *Order Establishing Procedures and Authorizing Payment of*  
6 *Professional Fees and Expenses on a Monthly Basis* (the “**Interim Compensation Order**”)  
7 [Dkt. No. 212] entered by the Court on October 16, 2023, for interim approval and allowance of  
8 (i) compensation for professional services rendered to the Committee from June 1, 2025 through  
9 September 30, 2025 (the “**Interim Fee Period**”) and (ii) reimbursement of expenses incurred in  
10 connection with such services; and, in support thereof, respectfully represents as follows:

#### 11 **PRELIMINARY STATEMENT**

12 1. Since Burns Bair’s retention by the Committee on October 19, 2023, Burns Bair  
13 has been actively engaged in all aspects of the case with the goal of maximizing insurance  
14 recoveries to unsecured creditors of the Debtor. Upon its retention, Burns Bair reviewed and  
15 analyzed the Debtor’s historical insurance policy materials, researched and analyzed the  
16 insurers’ purported coverage defenses and potential insurance litigation and settlements  
17 strategies for the Committee, presented to the Committee on case insurance issues, and began to  
18 develop the Committee’s overall insurance strategy, among other time-sensitive tasks.

19 2. These efforts have required Burns Bair to work closely with the Committee and  
20 its lead counsel to keep the Committee informed throughout this Chapter 11 Case. Burns Bair  
21 has also worked with the Debtor and its professional advisors, always with the goal of  
22 maximizing insurance returns for the unsecured creditors.

23 3. The Interim Application is based upon the points and authorities cited herein, the  
24 Declaration of Jesse J. Bair, filed concurrently herewith, the exhibits attached thereto, the  
25 pleadings, papers, and records on file in this case, and any evidence or argument that the Court  
26 may entertain at the time of the hearing on the Interim Application.

#### 27 **JURISDICTION**

28 4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. sections

1 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges,  
2 General Order 24 (N.D. Cal.), and Rule 5011-1(a) of the Local Rules. This is a core proceeding  
3 pursuant to 28 U.S.C. section 157(b)(2). Venue is proper before this Court pursuant to 28 U.S.C.  
4 sections 1408 and 1409.

## 5 **CASE BACKGROUND AND STATUS**

### 6 **A. Debtor's Bankruptcy Proceedings**

7 5. The Debtor filed a voluntary petition for relief under Chapter 11 of the  
8 Bankruptcy Code on August 21, 2023 (the "**Petition Date**"). The Debtor continues to operate  
9 its business and manages its properties as a debtor in possession pursuant to sections 1107(a)  
10 and 1108 of the Bankruptcy Code. By Order dated February 29, 2024, the Court appointed Elise  
11 S. Frejka as fee examiner in this Chapter 11 Case [Dkt. No. 517]. To date, the Debtor has not  
12 filed a plan or disclosure statement, and the Applicant does not know when the Debtor anticipates  
13 filing one.

### 14 **B. Selection of the Committee**

15 6. On September 1, 2023, pursuant to Section 1102 of the Bankruptcy Code, the  
16 Office of the United States Trustee (the "**U.S. Trustee**") selected interested creditors to serve on  
17 the Committee. Pursuant to section 1102(a)(1) of the Bankruptcy Code, the U.S. Trustee  
18 appointed nine members to serve on the Committee. On September 14, 2023, the Committee  
19 selected Pachulski Stang Ziehl & Jones LLP as its lead counsel. On October 19, 2023, the  
20 Committee selected Burns Bair LLP as special insurance counsel.

### 21 **C. The Committee's Retention of Burns Bair**

22 7. On November 29, 2023, the Court entered the *Order Approving Application of*  
23 *the Official Committee of Unsecured Creditors for Order Approving Employment of Burns Bair*  
24 *LLP as Special Insurance Counsel to the Official Committee of Unsecured Creditors*, effective  
25 October 19, 2023 [Dkt. No. 348] (the "**Retention Order**"). The Retention Order authorizes  
26 compensation and reimbursement to Burns Bair in accordance with the Bankruptcy Code, the  
27 Bankruptcy Rules, the Northern District Guidelines, the Local Rules, and the Interim  
28 Compensation Order. Subject to Burns Bair's application to the Court, the Debtor is authorized

1 by the Retention Order to compensate Burns Bair at its standard hourly rates for services  
2 performed and to reimburse it for actual and necessary expenses incurred. The Retention Order  
3 authorizes Burns Bair to provide the following services to the Committee: (1) analyze,  
4 investigate, and assess the availability of coverage under the Debtor's insurance policies; (2)  
5 represent the Committee in any adversary proceedings by and between the Debtor and its  
6 insurers; (3) engage in potential mediation and/or other resolution of the claims, demands, and/or  
7 lawsuits related to the Debtor's insurance policies; (4) advise, negotiate, and advocate on behalf  
8 of the Committee with respect to the Debtor's insurance policies; and (5) provide related advice  
9 and assistance to the Committee as necessary [Dkt No. 323].

10 **D. Summary of Professional Compensation and Reimbursement of Expenses Requested**

11 8. By this Interim Application, the Applicant seeks interim allowance of  
12 compensation in the amount of **\$226,738.00** and actual and necessary expenses in the amount of  
13 **\$11,812.10** for a total allowance of **\$238,550.10** for the Interim Fee Period.

14 9. All services for which Burns Bair requests compensation were performed for or  
15 on behalf of the Committee. Burns Bair has received no promises of payment from any source  
16 other than the Debtor for services rendered or to be rendered in any capacity whatsoever in  
17 connection with the matters covered by this Interim Application.

18 10. There is no agreement or understanding between Burns Bair and any other person  
19 other than the partners of Burns Bair for the sharing of compensation to be received for services  
20 rendered in this Chapter 11 Case. In connection with the Chapter 11 Case, as of this date, Burns  
21 Bair has been paid **\$106,176.00** in fees and **\$7,846.59** in expenses for the fees and expenses  
22 sought in this Interim Application.

23 11. Burns Bair has billed the Committee in accordance with its existing billing rates  
24 and procedures in effect during the Interim Fee Period. These rates are the same rates Burns  
25 Bair charges for services rendered by its attorneys and paraprofessionals in comparable matters  
26 and are reasonable given the compensation charged by comparably skilled practitioners in  
27 similar matters in both the California and national markets. The Summary Sheet filed herewith  
28 contains tables listing the Burns Bair attorneys and paraprofessionals who have performed

1 services for the Committee during the Interim Fee Period, including their job titles, hourly rates,  
2 aggregate number of hours worked in this matter, and, for attorneys, the year in which each  
3 professional was licensed to practice law. Exhibit D also contains a table summarizing the hours  
4 worked by the Firm's attorneys and paraprofessionals broken down by project billing code.  
5 Burns Bair maintains computerized time records, which have been filed on the docket with the  
6 Firm's monthly fee statements and furnished to the Committee, the Debtor, and the U.S. Trustee  
7 in the format specified by the Interim Compensation Order and are attached hereto as Exhibit F.  
8 The Committee has reviewed and approved on a monthly basis the fees and expenses requested  
9 herein.

10 12. To the extent that time or disbursement charges for services rendered or  
11 disbursements incurred relate to the Interim Fee Period but were not processed prior to the  
12 preparation of this Application, Burns Bair reserves the right to request additional compensation  
13 for such services and reimbursement of such expenses in a future application.

14 **SUMMARY OF SERVICES PERFORMED**  
15 **BY BURNS BAIR DURING THE INTERIM FEE PERIOD**

16 13. During the Interim Fee Period, Burns Bair professionals expended 283.90 hours  
17 on behalf of the Committee. Of this, 148.70 hours were expended by Burns Bair partners, 128.80  
18 by Burns Bair associates, and 6.40 by paraprofessionals. In accordance with the Interim  
19 Compensation Order, the Northern District Guidelines, the U.S. Trustee Guidelines, and the  
20 Local Rules, Burns Bair has classified services performed into four specific categories set forth  
21 below. Burns Bair has attempted to place the services provided in the category that best relates  
22 to such services; because certain services may relate to one or more categories, however, services  
23 pertaining to one category may in fact be included in another category. The following summary  
24 of services rendered during the Interim Fee Period is not intended to be a detailed description of  
25 the work performed. Rather, it merely highlights certain project billing categories in which  
26 significant services were rendered by Burns Bair, as well as identifies some of the issues Burns  
27 Bair was required to address.



**A. Committee Meetings**

**Fees: \$27,945.00; Total Hours: 33.20**

14. During the Interim Fee Period, Burns Bair attorneys attended Committee meetings and state court counsel meetings for the purpose of advising on case insurance issues. Meetings with the Committee and their state court counsel are a necessary aspect of Burns Bair's legal representation of the Committee.

**B. Fee Applications**

**Fees: \$4,594.00; Total Hours: 8.90**

15. During the Interim Fee Period, Burns Bair prepared four Monthly Fee Statements for the periods of May 1, 2025 through May 31, 2025 [Dkt. No. 1227], June 1, 2025 through June 30, 2025 [Dkt. 1277], July 1, 2025 through July 31, 2025 [Dkt. No. 1319], and August 1, 2025 through August 31, 2025 [Dkt. No. 1366]. Burns Bair also prepared its Fifth Interim Fee Application [Dkt. No. 1236].

**C. Insurance Recovery Activities**

**Fees: \$193,569.00; Total Hours: 241.10**

16. In addition to the above described tasks, during the Interim Fee Period, Burns Bair expended a considerable number of hours on behalf of the Committee performing additional insurance recovery activities including, but not limited to, preparing for and participating in numerous in-person and Zoom mediation sessions, including participating in various pre-session conferences with the mediators and Committee professionals; drafting insurance sections of the Committee's opposition to the Debtor's preliminary injunction motion, the Committee's reply to the insurers' lift stay objections, and the Committee's opposition to the insurers' motion to stay; detailed legal and factual analysis regarding potential lift stay cases and negotiation of same with Debtor; analysis regarding and drafting of Committee insurance demands; creation of detailed omnibus insurance presentations for presentation to the Committee and state court counsel in connection with case strategy and ongoing negotiations; reviewing and revising the debtor's proposed term sheet for insurance purposes; and continue formulating overall insurance strategy on behalf of the Committee, including consideration of mediation issues, Plan structure, and potential lift stay cases and/or insurance demands. These tasks are not meant to be a detailed description of all work performed.

1 **D. Hearings**

**Fees: \$630.00; Total Hours: .70**

2 17. During the Interim Fee Period, Burns Bair participated in a case status conference  
3 for insurance purposes.

4 **ACTUAL AND NECESSARY DISBURSEMENTS**

5 18. During the Interim Fee Period, Burns Bair incurred a total of **\$11,812.10** in  
6 expenses. These expenses relate primarily to travel in connection with in-person mediation  
7 sessions. These expenses are reasonable and necessary for the administration of the Chapter 11  
8 Case.

9 **LEGAL BASIS FOR INTERIM COMPENSATION**

10 19. The professional services for which Burns Bair requests interim allowance of  
11 compensation and reimbursement of expenses were rendered and incurred in connection with  
12 this case in the discharge of Burns Bair's professional responsibilities as special insurance  
13 counsel for the Committee in this Chapter 11 Case. Burns Bair's services have been necessary  
14 and beneficial to the Committee, the Debtor, its estate, creditors, and other parties of interest.

15 20. In accordance with the factors enumerated in section 330 of the Bankruptcy Code,  
16 Burns Bair respectfully submits that the amount requested by Burns Bair is fair and reasonable  
17 given the complexity of the Chapter 11 Case, the time expended, the nature and extent of the  
18 services rendered, the value of such services, and the costs of comparable services other than in  
19 a case under the Bankruptcy Code. Moreover, Burns Bair has reviewed the requirements of the  
20 Interim Compensation Order, the Northern District Guidelines, and the UST Guidelines and  
21 believes that the Interim Application complies with all of them.

22 **COMPLIANCE WITH LARGE CASE REQUIREMENTS**

23 21. Charts and tables based on such forms, and certain other exhibits, are attached  
24 and filled out with data to the extent relevant to this Chapter 11 Case:

25 **Exhibit B:** Customary and Comparable Compensation Disclosures with  
26 Fee Applications;

27 **Exhibit C:** Summary of Timekeepers in this Application;

28 **Exhibit D:** Summary of Compensation by Project Category;

**Exhibit E:** Summary of Expense Reimbursement; and

**Exhibit F:** Detailed records for the Compensation Period.

22. Pursuant to paragraph C.5 of the Large Case Guidelines, Burns Bair provides the following statements:

Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the application period? If so, please explain.	No.
If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No.
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.). If so, please quantify by hours and fees.	No. Any time worked on these tasks would have been in connection with preparing monthly fee statements.
Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.	No.
If the fee application includes any rate increases since retention: i. Did your client review and approve those rate increases in advance? ii. Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?	N/A

**AVAILABLE FUNDS**

23. The Applicant understands that the Debtor's estate has sufficient funds available to pay the fees and costs sought herein.

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Respectfully submitted,

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## **Exhibit A**

1 TIMOTHY W. BURNS (admitted *pro hac vice*)  
Wisconsin Bar #1068086

2 JESSE J. BAIR (admitted *pro hac vice*)  
Wisconsin Bar #1083779

3 **BURNS BAIR LLP**

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8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

10 In re:

Case No.: 23-30564

11 THE ROMAN CATHOLIC ARCHBISHOP  
OF SAN FRANCISCO,

Chapter 11

12 Debtor and Debtor in Possession.

13 **ORDER APPROVING SIXTH INTERIM**  
14 **APPLICATION OF BURNS BAIR LLP FOR**  
15 **ALLOWANCE AND PAYMENT OF**  
16 **COMPENSATION AND REIMBURSEMENT**  
**OF EXPENSES FOR THE PERIOD JUNE 1,**  
**2025 THROUGH SEPTEMBER 30, 2025**

17 On December 4, 2025 at 1:30 p.m., the matter of the *Sixth Interim Application of Burns*  
18 *Bair LLP for Allowance and Payment of Compensation and Reimbursement of Expenses for the*  
19 *Period June 1, 2025 through September 30, 2025* (the “Application”) [Docket No. \_\_\_\_], filed by  
20 Burns Bair LLP (“Burns Bair”), special insurance counsel to the Official Committee of Unsecured  
21 Creditors in the above-captioned bankruptcy case, came before this Court for hearing.

22 The Court has reviewed and considered the Application and the declaration in support  
23 thereof, the *Fee Examiner’s Consolidated Final Report Regarding Sixth Interim Fee Applications*  
24 (the “Fee Examiner Report”) [Docket No. \_\_\_\_], and the statements of counsel at the hearing on  
25 the Application.

26 The Court hereby adopts the recommendations in the Fee Examiner’s Report as they pertain  
27 to Burns Bair. Accordingly,  
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**IT IS HEREBY ORDERED** that:

- 1. The Application is GRANTED in the amounts set forth in the Fee Examiner Report.
- 2. Burns Bair’s fees in the amount of \$226,738.00 and expenses in the amount of \$11,812.10 are hereby approved on an interim basis.
- 3. The Debtor is authorized and directed immediately to pay Burns Bair a total of \$124,527.51, reflecting the remaining balance due under the Application.

APPROVED AS TO FORM:

\_\_\_\_\_  
Elise S. Frejka, Fee Examiner

**\*\*\* END OF ORDER \*\***

## **EXHIBIT B**

### **Customary and Comparable Disclosures with Fee Applications**

**Privacy Act Statement.** 28 U.S.C. § 586(a)(3)(A) authorizes the collection of this information. The United States Trustee will use the information contained in this form to evaluate whether compensation and reimbursement of expenses filed by attorneys in larger chapter 11 cases - those cases with \$50 million or more in assets and \$50 million or more in liabilities - are appropriate and reasonable pursuant to 11 U.S.C. § 330. Disclosure of this information may be to a bankruptcy trustee or examiner when the information is needed to perform the trustee's or examiner's duties, or to the appropriate federal, state, local, regulatory, tribal, or foreign law enforcement agency when the information indicates a violation or potential violation of law. Other disclosures may be made for routine purposes. For a discussion of the types of routine disclosures that may be made, you may consult the Executive Office for United States Trustee's systems of records notice, UST-001, "Bankruptcy Case Files and Associated Records." See 71 Fed. Reg. 59,818 et seq. (Oct. 11, 2006). A copy of the notice may be obtained at the following link: <https://www.gpo.gov/fdsys/pkg/FR-2006-10-11/pdf/E6-16814.pdf>.

Failure to provide this information could result in an objection to your fee application, or other action by the United States Trustee. 11 U.S.C. § 330.

(See Guidelines ¶ C.3. for definitions of terms used in this Exhibit.)

Category of Timekeeper	Blended Hourly Rate	
	BILLED <sup>1</sup> Firm for proceeding year, excluding bankruptcy	BILLED In the Interim Fee Period
Partner	\$977.79	\$1,037.00
Associate	\$513.45	\$546.27
Paralegal	\$374.81	\$340.00
All Timekeepers Aggregated	\$622.67	\$798.65

Case Name: Roman Catholic Archbishop of San Francisco  
Case Number: 23-BK-30564  
Applicant's Name: Burns Bair LLP  
Date of Application: October 23, 2025  
Interim or Final: Interim

<sup>1</sup> In addition to traditional hourly matters, Burns Bair also worked on contingent cases where hours are tracked each month, but not billed to the client.



**EXHIBIT C**

**Summary of Timekeepers Included in this Interim Fee Application**

<b>NAME OF PROFESSIONAL:</b>	<b>POSITION</b>	<b>YEAR ADMITTED</b>	<b>HOURLY RATE</b>	<b>TOTAL HOURS</b>	<b>TOAL FEES</b>
Timothy Burns	Partner	1991	\$1,120.00	92.60	\$103,712.00
Jesse Bair	Partner	2013	\$900.00	56.10	\$50,490.00
Brian Cawley	Associate	2020	\$550.00	122.80	\$67,540.00
Alexander Castro	Associate	2024	\$470.00	6.00	\$2,820.00
Brenda Horn-Edwards	Paralegal	N/A	\$340.00	6.00	\$2,040.00
Karen Dempski	Paralegal	N/A	\$340.00	.40	\$136.00
<b>Total:</b>				<b>283.90</b>	<b>\$226,738.00</b>

**EXHIBIT D**

**Summary of Compensation Requested by Category**

<b>Category</b>	<b>Hours Billed this Fee Period</b>	<b>Total for Fee Statement</b>
Committee Meetings	33.20	\$27,945.00
Fee Applications	8.90	\$4,594.00
Hearings	.70	\$630.00
Insurance Recovery Activities	241.10	\$193,569.00
<b>Total:</b>	<b>283.90</b>	<b>\$226,738.00</b>

**EXHIBIT E**

**Summary of Expense Reimbursement**

<b>Expense Category</b>	<b>Total Expenses</b>
Postage	\$4.80
Travel (flights, taxi, hotels, meals, parking)	\$11,807.30
<b>TOTAL:</b>	<b>\$11,812.10</b>

# **Exhibit F**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
Archbishop of San Francisco**

**Issue Date :** 7/15/2025

**Bill # :** 01979

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
6/19/2025	Timothy Burns	Participate in Committee meeting for insurance purposes re case developments, insurance strategy, and next-steps (1.7);	1.70	\$1,904.00
6/19/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re case status, developments, and strategy (1.7);	1.70	\$1,530.00
<b>Totals for Committee Meetings</b>			<b>3.40</b>	<b>\$3,434.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
6/19/2025	Jesse Bair	Correspond with G. Brown and B. Horn-Edwards re monthly fee statement (.1);	0.10	\$90.00
6/30/2025	Brenda Horn-Edwards	Draft monthly fee statement and certificate of service (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
6/30/2025	Brenda Horn-Edwards	File and serve monthly fee statement (.2);	0.20	\$68.00
6/30/2025	Jesse Bair	Review and edit monthly fee statement and correspond with B. Horn-Edwards re same (.1);	0.10	\$90.00
<b>Totals for Fee Applications</b>			<b>0.70</b>	<b>\$350.00</b>

### Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
6/1/2025	Jesse Bair	Correspond with PSZJ re call to discuss insurance issues re the debtor's preliminary injunction motion (.1);	0.10	\$90.00

6/2/2025	Jesse Bair	Review additional correspondence with PSZJ re PI insurance discussion (.1);	0.10	\$90.00
6/2/2025	Brian Cawley	Continue drafting motion for comfort order re sending insurance demands (.5);	0.50	\$275.00
6/3/2025	Timothy Burns	Review correspondence with Committee professionals re preliminary injunction motion (.1);	0.10	\$112.00
6/3/2025	Brian Cawley	Correspond with the debtor re re-designation of policies (.2);	0.20	\$110.00
6/3/2025	Brian Cawley	Analyze policy secondary evidence and redact same for redesignation (1.0);	1.00	\$550.00
6/3/2025	Timothy Burns	Review internal correspondence re comfort order motion and draft (.2);	0.20	\$224.00
6/3/2025	Jesse Bair	Review and edit draft comfort order brief re insurance demand letters (.4);	0.40	\$360.00
6/3/2025	Jesse Bair	Review correspondence with B. Michael and state court counsel re case developments (.1);	0.10	\$90.00
6/4/2025	Brian Cawley	Participate in call with Committee professionals re insurance response to the debtor's preliminary injunction motion and other case insurance issues (1.1);	1.10	\$605.00
6/4/2025	Timothy Burns	Participate in conference with state court counsel re case insurance issues (.2); participate in conference with J. Bair re same and next-steps (.2);	0.40	\$448.00
6/4/2025	Timothy Burns	Prepare for insurance mediation session with the debtor (.8);	0.80	\$896.00
6/4/2025	Timothy Burns	Participate in Zoom mediation session with the debtor re case insurance issues (1.0);	1.00	\$1,120.00
6/4/2025	Timothy Burns	Participate in post-mediation strategy call with Committee professionals re outcome of mediation session and next-steps (.3);	0.30	\$336.00
6/4/2025	Jesse Bair	Prepare for Zoom mediation session re case insurance issues (.3); participate in Zoom mediation session re case insurance issues (1.0); participate in post-session call with PSZJ and T. Burns re outcome of same and next-steps (.3);	1.60	\$1,440.00
6/4/2025	Jesse Bair	Review the debtor's preliminary injunction brief, associated exhibits, and draft outline of insurance arguments in response to same (.9);	0.90	\$810.00
6/4/2025	Jesse Bair	Participate in call with Committee professionals re insurance response to the debtor's preliminary injunction motion, upcoming mediation, and other case insurance issues (1.1); participate in call with T. Burns re same and next-steps (.2);	1.30	\$1,170.00

6/5/2025	Jesse Bair	Participate in conference with T. Burns re outcome of insurance mediation session and next-steps in light of same (.5);	0.50	\$450.00
6/5/2025	Timothy Burns	Participate in conference with J. Bair re mediation session outcome and related insurance strategy moving forward (.5);	0.50	\$560.00
6/5/2025	Timothy Burns	Participate in call with state court counsel re mediation developments (.2); participate in call with PSZJ re same (.3);	0.50	\$560.00
6/6/2025	Timothy Burns	Review stipulated tolling agreement re avoidance claims (.1);	0.10	\$112.00
6/6/2025	Brian Cawley	Complete policy analysis and redaction and send to debtor insurance counsel for redesignation with description of same (1.9);	1.90	\$1,045.00
6/9/2025	Timothy Burns	Review and respond to correspondence with BB and PSZJ re preliminary injunction opposition (.2);	0.20	\$224.00
6/9/2025	Timothy Burns	Correspond with state court counsel re lift stay issues (.2);	0.20	\$224.00
6/9/2025	Jesse Bair	Review and edit the Committee's preliminary injunction opposition brief (1.1); review and respond to correspondence with PSZJ and state court counsel re same and potential additional edits (.2);	1.30	\$1,170.00
6/9/2025	Jesse Bair	Review correspondence with Committee professionals re outstanding insurance discovery requests to the debtor (.1);	0.10	\$90.00
6/9/2025	Brian Cawley	Review and respond to correspondence with PSZJ re outstanding insurance discovery requests and status of insurance document production (.3);	0.30	\$165.00
6/9/2025	Brian Cawley	Draft Bair declaration in support of opposition to preliminary injunction motion (2.1);	2.10	\$1,155.00
6/10/2025	Jesse Bair	Review and edit Bair declaration in support of the Committee's opposition to the debtor's preliminary injunction motion (.4); correspond with PSZJ re same (.1);	0.50	\$450.00
6/10/2025	Timothy Burns	Review and respond to correspondence with state court counsel and Committee professionals re preliminary injunction Opposition (.2);	0.20	\$224.00
6/11/2025	Jesse Bair	Review the debtor's insurance proposal and correspond with BB team re same (.2);	0.20	\$180.00

6/12/2025	Jesse Bair	Review details re potential lift stay cases proposed by the debtor (.2); correspond with Committee professionals re same and call to discuss case insurance issues (.1); review correspondence with the mediator's office and mediation parties re upcoming sessions (.1);	0.40	\$360.00
6/12/2025	Timothy Burns	Review debtor's insurance proposal and related correspondence with Committee professionals (.3);	0.30	\$336.00
6/12/2025	Karen Dempksi	Docket/calendar mediation dates (.1);	0.10	\$34.00
6/13/2025	Jesse Bair	Prepare for call with Committee professionals re debtor's insurance proposal, lift stay issues, and potential next-steps (.1); participate in call with Committee professionals re same (.7);	0.80	\$720.00
6/13/2025	Jesse Bair	Participate in call with the debtor re the debtor's insurance proposal (.1);	0.10	\$90.00
6/13/2025	Timothy Burns	Review and respond to correspondence between mediators and parties re mediation (.2);	0.20	\$224.00
6/13/2025	Karen Dempksi	Docket/calendar adversary proceeding dates (.1);	0.10	\$34.00
6/13/2025	Timothy Burns	Review the debtor's preliminary injunction brief (.3); review the Committee's draft opposition to same (.3);	0.60	\$672.00
6/13/2025	Timothy Burns	Participate in strategy call with Committee professionals re preliminary injunction issues, mediation, and the debtor's insurance proposals (.7);	0.70	\$784.00
6/13/2025	Timothy Burns	Review internal correspondence re preliminary injunction adversary filings (.1);	0.10	\$112.00
6/13/2025	Timothy Burns	Review High School Survivors Stay Stipulation in adversary (.2);	0.20	\$224.00
6/13/2025	Timothy Burns	Review and respond to internal correspondence re upcoming mediation sessions (.1);	0.10	\$112.00
6/16/2025	Timothy Burns	Review and respond to internal correspondence re upcoming mediation session (.1);	0.10	\$112.00
6/16/2025	Timothy Burns	Review correspondence with the debtor and B. Michael re mediation issues (.1);	0.10	\$112.00
6/16/2025	Timothy Burns	Review B. Michael correspondence with state court counsel re stay relief cases (.2);	0.20	\$224.00
6/16/2025	Jesse Bair	Analyze potential lift stay cases proposed by the debtor (.4); review and respond to correspondence with Committee professionals and state court counsel re same (.2);	0.60	\$540.00



6/17/2025	Timothy Burns	Review and respond to correspondence with B. Michael and state court counsel re mediation negotiations (.2);	0.20	\$224.00
6/17/2025	Timothy Burns	Prepare for calls with state court counsel re lift stay issues and potential cases (1.2);	1.20	\$1,344.00
6/17/2025	Timothy Burns	Participate in call with state court counsel firm re potential lift stay cases (.6);	0.60	\$672.00
6/17/2025	Brian Cawley	Participate in call with state court counsel re potential stay relief cases (.6);	0.60	\$330.00
6/17/2025	Brian Cawley	Participate in call with second state court counsel firm re potential stay relief cases (.8);	0.80	\$440.00
6/17/2025	Timothy Burns	Participate in call with J. Bair re insurance mediation issues (.1);	0.10	\$112.00
6/17/2025	Timothy Burns	Participate in call with second state court counsel firm re potential stay relief cases (.8);	0.80	\$896.00
6/17/2025	Brian Cawley	Analyze claims and prepare spreadsheets / summaries in preparation for calls with various state court counsel to discuss potential stay relief cases (2.7);	2.70	\$1,485.00
6/17/2025	Jesse Bair	Prepare for call with B. Michael and state court counsel re potential lift stay cases (.3); participate in call with B. Michael and third state court counsel firm re same (.6); review and respond to correspondence with BB re same and analysis of additional potential cases, including review of B. Cawley memos re same (.3);	1.20	\$1,080.00
6/17/2025	Jesse Bair	Participate in call with T. Burns re insurance mediation issues (.1);	0.10	\$90.00
6/18/2025	Jesse Bair	Review and edit B. Cawley insurance overview memo (.1); review agenda for upcoming Committee meeting and related correspondence with the Committee (.1);	0.20	\$180.00
6/18/2025	Brian Cawley	Continue analyzing claims and prepare additional spreadsheets / summaries in preparation for calls with various state court counsel to discuss potential stay relief cases (1.6);	1.60	\$880.00
6/18/2025	Brian Cawley	Draft summary re potential lift stay cases and status of selection process (1.0);	1.00	\$550.00
6/18/2025	Timothy Burns	Review and respond to correspondence with state court counsel and B. Michael re potential lift stay cases (.1);	0.10	\$112.00
6/18/2025	Timothy Burns	Prepare for additional calls with state court counsel firms re lift stay case selection (.3);	0.30	\$336.00
6/18/2025	Timothy Burns	Participate in call with fourth state court counsel firm re potential lift stay cases (.7);	0.70	\$784.00
6/18/2025	Brian Cawley	Participate in call with fourth state court counsel firm re lift stay case selection (.7);	0.70	\$385.00

6/18/2025	Brian Cawley	Participate in call with fifth state court counsel firm re potential stay relief cases (1.0);	1.00	\$550.00
6/19/2025	Jesse Bair	Correspond with PSZJ re the debtor's preliminary injunction reply brief (.1);	0.10	\$90.00
6/19/2025	Brian Cawley	Prepare revised case overview memo for use during upcoming mediation (1.8);	1.80	\$990.00
6/20/2025	Brian Cawley	Analyze debtor's reply to preliminary injunction motion in preparation for upcoming mediation (.5);	0.50	\$275.00
6/20/2025	Jesse Bair	Review the debtor's preliminary injunction reply brief (.5); review and respond to various correspondence with PSZJ re same and oral arguments in response (.4);	0.90	\$810.00
6/21/2025	Jesse Bair	Review B. Michael email memo re responses to the Debtor's preliminary injunction reply brief (.1);	0.10	\$90.00
6/23/2025	Timothy Burns	Review and analysis of the debtor's Preliminary Injunction Reply Brief (.4);	0.40	\$448.00
6/23/2025	Timothy Burns	Prepare for mediation session by reviewing mediation memo and notes from file (.8);	0.80	\$896.00
6/23/2025	Brian Cawley	Respond to T. Burns request regarding mediation summary materials (.1);	0.10	\$55.00
6/24/2025	Brian Cawley	Analyze case materials in preparation for mediation (.8);	0.80	\$440.00
6/24/2025	Brian Cawley	Participate in full-day mediation session (6.2);	6.20	\$3,410.00
6/24/2025	Jesse Bair	Review debtor correspondence re insurance proposal (.1); review text order re June 26 hearing structure (.1);	0.20	\$180.00
6/24/2025	Timothy Burns	Finish preparing for mediation session (1.1);	1.10	\$1,232.00
6/24/2025	Timothy Burns	Participate in full-day mediation session (6.2)	6.20	\$6,944.00
6/24/2025	Timothy Burns	Review and revise mediation summary to the Committee (.2); review and respond to correspondence with Committee professionals re mediation and case strategy (.3);	0.50	\$560.00
6/25/2025	Timothy Burns	Review final version of mediation outcome summary (.1); review and respond to various correspondence with B. Michael re insurance demands (.4);	0.50	\$560.00
6/25/2025	Timothy Burns	Participate in conference with J. Bair re mediation session outcome (.2);	0.20	\$224.00

6/25/2025	Jesse Bair	Participate in conference with T. Burns re outcome of mediation session (.2); review correspondence with Committee professionals, the Committee, and state court counsel re same and insurance next-steps (.1); review correspondence with the debtor and Committee professionals re insurance agreements (.1);	0.40	\$360.00
6/25/2025	Brian Cawley	Analyze recent correspondence and begin preparing insurance demand template (.5);	0.50	\$275.00
6/30/2025	Brian Cawley	Participate in conference with T. Burns re insurance demands (.2);	0.20	\$110.00
6/30/2025	Brian Cawley	Finish drafting insurance demand template, including associated legal research in connection with same (3.6);	3.60	\$1,980.00
6/30/2025	Timothy Burns	Review and respond to B. Michael's correspondence re insurance strategy (.2); conference with B. Cawley re insurance demands (.2);	0.40	\$448.00
6/30/2025	Jesse Bair	Review correspondence with Committee professionals re insurer demands (.1);	0.10	\$90.00
<b>Totals for Insurance Recovery Activities</b>			<b>62.90</b>	<b>\$50,942.00</b>
<b>Total Hours and Fees</b>			<b>67.00</b>	<b>\$54,726.00</b>

#### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
06/23/2025	Delta Airlines, T. Burns (MSN-SFO June 23-25)	\$1,208.37
06/23/2025	United Airlines, B. Cawley (MSN-SFO June 23-25)	\$860.21
06/23/2025	Hotel, B. Cawley (2 nights)	\$855.41
06/23/2025	Travel meal, B. Cawley	\$25.10
06/23/2025	Hotel, T. Burns (2 nights)	\$855.41
06/23/2025	Travel meal, T. Burns	\$18.81
06/23/2025	Uber, B. Cawley (home to airport)	\$17.95
06/23/2025	Uber, B. Cawley (airport to hotel)	\$71.99
06/24/2025	Travel meal, B. Cawley	\$24.73
06/25/2025	Taxi, T. Burns (hotel to airport)	\$85.00
06/25/2025	Travel meal, B. Cawley	\$13.87
06/25/2025	Travel meal, B. Cawley	\$18.66
06/25/2025	Uber, B. Cawley (hotel to airport)	\$51.99
06/25/2025	Uber, B. Cawley (airport to office)	\$25.94
06/25/2025	Airport parking, T. Burns	\$30.00
06/30/2025	Postage	\$1.01
<b>Total Expenses</b>		<b>\$4,164.45</b>

**Timekeeper Summary**

<u><b>Name</b></u>	<u><b>Title</b></u>	<u><b>Hours</b></u>	<u><b>Rate</b></u>	<u><b>Amount</b></u>
Brenda Horn-Edwards	Paralegal	0.50	\$340.00	\$170.00
Brian Cawley	Associate	29.20	\$550.00	\$16,060.00
Jesse Bair	Partner	14.20	\$900.00	\$12,780.00
Karen Dempski	Paralegal	0.20	\$340.00	\$68.00
Timothy Burns	Partner	22.90	\$1,120.00	\$25,648.00

**Total Due This Invoice: \$58,890.45**

# Burns | Bair

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Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
Archbishop of San Francisco**

**Issue Date :** 8/19/2025

**Bill # :** 02001

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/10/2025	Brian Cawley	Participate in Committee meeting for insurance purposes (1.1);	1.10	\$605.00
7/10/2025	Jesse Bair	Participate in Committee meeting for insurance purposes re case developments, strategy, and next-steps (1.1);	1.10	\$990.00
7/18/2025	Timothy Burns	Participate in state court counsel meeting for insurance purposes re ongoing negotiations (.5);	0.50	\$560.00
7/18/2025	Brian Cawley	Participate in state court counsel meeting for insurance purposes re ongoing negotiations (.5);	0.50	\$275.00
7/30/2025	Timothy Burns	Present insurance presentation at state court counsel meeting (.8);	0.80	\$896.00
7/30/2025	Brian Cawley	Participate in state court counsel meeting re case insurance strategy (.8);	0.80	\$440.00
7/31/2025	Timothy Burns	Present omnibus Committee insurance presentation to Committee co-chairs (1.3);	1.30	\$1,456.00
<b>Totals for Committee Meetings</b>			<b>6.10</b>	<b>\$5,222.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
7/2/2025	Jesse Bair	Review and respond to correspondence with G. Brown and B. Horn-Edwards re next round of interim fee applications (.1);	0.10	\$90.00
7/3/2025	Brenda Horn-Edwards	Draft Burns Bair fifth interim fee application (1.5);	1.50	\$510.00
7/3/2025	Brenda Horn-Edwards	Draft exhibits to Burns Bair fifth interim fee application (.8);	0.80	\$272.00

7/3/2025	Brenda Horn-Edwards	Draft declaration of J. Bair in support of Burns Bair fifth interim fee application (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
7/3/2025	Brenda Horn-Edwards	Correspond with J. Bair re next round of interim fee applications (.1);	0.10	\$34.00
7/6/2025	Jesse Bair	Review and edit Burns Bair interim fee application and accompanying exhibits (1.1);	1.10	\$990.00
7/7/2025	Jesse Bair	Review and respond to correspondence with PSZJ and B. Horn-Edwards re next round of interim fee applications (.1);	0.10	\$90.00
7/7/2025	Brenda Horn-Edwards	Correspond with PSZJ and J. Bair re interim fee application (.1);	0.10	\$34.00
7/9/2025	Jesse Bair	Review draft IFA notice of hearing and correspond with PSZJ re same (.1);	0.10	\$90.00
7/10/2025	Brenda Horn-Edwards	Revise, finalize, and file fifth interim fee application, exhibits, and declaration of J. Bair (.5); correspond with PSZJ and J. Bair re same (.2);	0.70	\$238.00
7/10/2025	Karen Dempksi	Docket/calendar interim fee applications' hearing (.1);	0.10	\$34.00
7/15/2025	Brenda Horn-Edwards	Draft monthly fee statement and certificate of service (.2); correspond with J. Bair re same (.1);	0.30	\$102.00
7/15/2025	Jesse Bair	Correspond with G. Brown and B. Horn-Edwards re monthly fee statement (.1);	0.10	\$90.00
7/30/2025	Jesse Bair	Review and edit monthly fee statement and correspond with PSZJ and B. Horn-Edwards re same (.2);	0.20	\$180.00
7/30/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and certificate of service and correspond with J. Bair re same (.3);	0.30	\$102.00
7/30/2025	Brenda Horn-Edwards	File and serve Burns Bair monthly professional fee statement (.2);	0.20	\$68.00
<b>Totals for Fee Applications</b>			<b>6.10</b>	<b>\$3,026.00</b>

### **Insurance Recovery Activities**

<b><u>Date</u></b>	<b><u>Timekeeper</u></b>	<b><u>Narrative</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
7/1/2025	Brian Cawley	Draft revised version of insurance demand template incorporating suggestions from T. Burns, including supplemental legal research in connection with same (3.3);	3.30	\$1,815.00
7/2/2025	Jesse Bair	Review and respond to correspondence with the debtor re meet and confer re coverage litigation (.1);	0.10	\$90.00
7/2/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re insurance demand letters (.2); correspond with state court counsel re same (.2);	0.40	\$448.00

7/3/2025	Timothy Burns	Review California case law on duty to protect in connection with demand letter issues (.7);	0.70	\$784.00
7/3/2025	Timothy Burns	Participate in meet and confer with debtor re case insurance issues (.4);	0.40	\$448.00
7/3/2025	Jesse Bair	Participate in meet and confer with the debtor re case insurance issues (.4);	0.40	\$360.00
7/7/2025	Jesse Bair	Review correspondence with Committee professionals re insurance demands (.2);	0.20	\$180.00
7/9/2025	Jesse Bair	Brief review re the debtor's proposed lift stay cases and related analysis in connection with same (.2);	0.20	\$180.00
7/9/2025	Jesse Bair	Review and edit draft lift stay stipulation and correspond with Committee professionals re same (.4);	0.40	\$360.00
7/9/2025	Brian Cawley	Analyze insurance issues in connection with the debtor's proposed lift stay cases (1.8);	1.80	\$990.00
7/10/2025	Brian Cawley	Participate in mediation session re case insurance issues (1.3);	1.30	\$715.00
7/10/2025	Brian Cawley	Additional analysis of potential lift stay cases in connection with mediation session (1.2);	1.20	\$660.00
7/10/2025	Timothy Burns	Participate in portion of mediation session re case insurance issues (.6); participate in post-session call with PSZJ re outcome of same and next-steps (.2);	0.80	\$896.00
7/10/2025	Timothy Burns	Conference with J. Bair re mediation issues (.2);	0.20	\$224.00
7/10/2025	Brian Cawley	Participate in call with PSZJ re demand letter issues (.3);	0.30	\$165.00
7/10/2025	Timothy Burns	Participate in call with state court counsel re lift stay issues and potential cases (.5);	0.50	\$560.00
7/10/2025	Timothy Burns	Review correspondence from J. Stang re demand letters (.1);	0.10	\$112.00
7/10/2025	Jesse Bair	Prepare for mediation (.1); participate in portion of mediation session with the debtor re case insurance issues and lift stay case selection (.7);	0.80	\$720.00
7/10/2025	Jesse Bair	Participate in call with state court counsel re lift stay issues and potential cases (.5);	0.50	\$450.00
7/10/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re lift stay case selection (.2);	0.20	\$224.00
7/10/2025	Timothy Burns	Review B. Cawley's mediation summary (.1);	0.10	\$112.00
7/10/2025	Brian Cawley	Additional research re duty to protect case law in connection with ongoing case insurance issues (1.4);	1.40	\$770.00



7/11/2025	Jesse Bair	Analyze potential additional lift stay case options and correspond with the debtor, Committee professionals, and mediators re same (.3);	0.30	\$270.00
7/13/2025	Jesse Bair	Review and respond to correspondence with the debtor and mediators re supplemental meet and confer re lift stay case selection (.1);	0.10	\$90.00
7/14/2025	Jesse Bair	Prepare for meet and confer with the debtor re lift stay case selection (.2); participate in meet and confer with the debtor re same (.8);	1.00	\$900.00
7/14/2025	Brian Cawley	Continue insurance analysis re potential lift stay cases (.9);	0.90	\$495.00
7/15/2025	Timothy Burns	Review correspondence with the debtor and Committee professionals re lift stay cases (.2);	0.20	\$224.00
7/15/2025	Jesse Bair	Review correspondence with state court counsel and Committee professionals re final selection of lift stay cases (.2);	0.20	\$180.00
7/16/2025	Brian Cawley	Participate in call with PSZJ re demand letters (.3);	0.30	\$165.00
7/16/2025	Brian Cawley	Participate in conference with J. Bair re lift stay case selection (.2);	0.20	\$110.00
7/16/2025	Jesse Bair	Participate in conference with B. Cawley re lift stay case finalization and next-steps in connection with same (.2);	0.20	\$180.00
7/17/2025	Brian Cawley	Participate in call with the mediators and Committee professionals re ongoing negotiations (.8);	0.80	\$440.00
7/17/2025	Timothy Burns	Participate in call with the mediators and Committee professionals re ongoing negotiations (.8);	0.80	\$896.00
7/17/2025	Timothy Burns	Conference with J. Bair re debtor mediation proposal (.2);	0.20	\$224.00
7/17/2025	Jesse Bair	Participate in conference with T. Burns re debtor mediation proposal (.2);	0.20	\$180.00
7/18/2025	Timothy Burns	Review the debtor's mediation term sheet (.7);	0.70	\$784.00
7/18/2025	Timothy Burns	Participate in call with state court counsel re case insurance issues (.2);	0.20	\$224.00
7/18/2025	Timothy Burns	Conference with J. Bair re insurance issues (.2);	0.20	\$224.00
7/18/2025	Timothy Burns	Prepare memo to file re next steps re mediation insurance issues and preliminary analysis in connection with same (.8);	0.80	\$896.00
7/18/2025	Timothy Burns	Review California insurance research (.2); correspondence and conferences with internal team re follow up assignments (.2);	0.40	\$448.00



7/18/2025	Alexander Castro	Research California case law re bad faith claim splitting (3.6);	3.60	\$1,692.00
7/18/2025	Brian Cawley	Draft omnibus insurance overview memo for use during upcoming mediation sessions (1.9);	1.90	\$1,045.00
7/18/2025	Brian Cawley	Analyze Archdiocese term sheet in preparation for state court counsel meeting (.5);	0.50	\$275.00
7/18/2025	Jesse Bair	Participate in call with T. Burns re preparations and strategy for upcoming mediation session (.2); provide instructions to B. Cawley re additional insurance preparations needed in connection with same (.1);	0.30	\$270.00
7/20/2025	Timothy Burns	Draft insurance mediation presentation (3.2);	3.20	\$3,584.00
7/21/2025	Jesse Bair	Participate in conference with BB team re strategy for upcoming mediation and provide instructions to B. Cawley re additional analysis/preparation in connection with same (.2);	0.20	\$180.00
7/21/2025	Brian Cawley	Revise and implement partner edits into insurance mediation presentation (2.9);	2.90	\$1,595.00
7/21/2025	Brian Cawley	Conference with J. Bair re mediation strategy and presentation (.2);	0.20	\$110.00
7/21/2025	Timothy Burns	Prepare for insurance mediation session (3.4);	3.40	\$3,808.00
7/22/2025	Jesse Bair	Participate in conferences with T. Burns re insurance strategy, mediation developments, and related presentations to the Committee and state court counsel (.3);	0.30	\$270.00
7/22/2025	Brian Cawley	Analyze case documents, notes, and coverage materials in preparation for mediation (.7);	0.70	\$385.00
7/22/2025	Alexander Castro	Finish research re bad faith claim splitting under California law and draft memo summarizing same (2.4);	2.40	\$1,128.00
7/22/2025	Brian Cawley	Participate in full-day mediation session (6.6); participate in post-session conferences with the Committee, Committee professionals, and state court counsel re strategy and next-steps (1.3);	7.90	\$4,345.00
7/22/2025	Timothy Burns	Finish preparations for mediation (1.3);	1.30	\$1,456.00
7/22/2025	Timothy Burns	Participate in full-day mediation session (6.6); participate in post-session conferences with the Committee, Committee professionals, and state court counsel re strategy and next-steps (1.3);	7.90	\$8,848.00
7/24/2025	Jesse Bair	Participate in conference with BB team re mediation outcome and formulate strategy re insurance next-steps (.3);	0.30	\$270.00

7/24/2025	Timothy Burns	Participate in conference with BB team re insurance strategy in light of mediation session outcome (.3);	0.30	\$336.00
7/24/2025	Brian Cawley	Participate in BB team conference re mediation session outcome and insurance next-steps in light of same (.3);	0.30	\$165.00
7/25/2025	Brian Cawley	Review and respond to correspondence with PSZJ re insurance demands (.2);	0.20	\$110.00
7/25/2025	Brian Cawley	Begin drafting detailed Committee presentation re insurance overview, exposure assessments, and revised case insurance strategy (7.2);	7.20	\$3,960.00
7/25/2025	Timothy Burns	Review correspondence with BB and PSZJ re demand letters and Committee presentation (.2);	0.20	\$224.00
7/25/2025	Jesse Bair	Analysis re potential insurance Plan structure (.2);	0.20	\$180.00
7/26/2025	Brian Cawley	Continue drafting detailed Committee presentation re insurance overview, exposure assessments, and revised case insurance strategy (2.2);	2.20	\$1,210.00
7/27/2025	Brian Cawley	Finish drafting detailed Committee presentation re insurance overview, exposure assessments, and revised case insurance strategy (4.5);	4.50	\$2,475.00
7/28/2025	Timothy Burns	Participate in call with B. Michael re Committee insurance presentation (.2); participate in call with state court counsel re same (.2);	0.40	\$448.00
7/28/2025	Timothy Burns	Review and revise omnibus insurance strategy presentation to the Committee (2.6);	2.60	\$2,912.00
7/28/2025	Timothy Burns	Review and revise latest draft of omnibus Committee insurance presentation (.8);	0.80	\$896.00
7/28/2025	Jesse Bair	Review draft presentation re Committee insurance strategy (.2);	0.20	\$180.00
7/28/2025	Brian Cawley	Draft revised version of omnibus Committee insurance presentation, incorporating various suggestions and edits from Committee professionals (3.6);	3.60	\$1,980.00
7/29/2025	Timothy Burns	Review and revise latest draft of omnibus Committee insurance presentation (.9); correspond with BB team re same (.2);	1.10	\$1,232.00
7/29/2025	Timothy Burns	Conference with B. Michael re latest draft of omnibus Committee insurance presentation (.2); correspondence with Committee professionals re same (.1);	0.30	\$336.00
7/29/2025	Timothy Burns	Participate in calls with PSZJ and state court counsel re case insurance strategy (.8); review and respond to correspondence with state court counsel re same (.4);	1.20	\$1,344.00

7/29/2025	Timothy Burns	Final review and revisions to omnibus Committee insurance presentation (.7);	0.70	\$784.00
7/29/2025	Jesse Bair	Review revised version of insurance strategy presentation to the Committee and state court counsel (.3);	0.30	\$270.00
7/29/2025	Jesse Bair	Review draft motion to approve lift stay stipulation and related correspondence with the debtor and Committee professionals re same (.2);	0.20	\$180.00
7/30/2025	Timothy Burns	Final preparations for state court counsel meeting re insurance strategy (.8);	0.80	\$896.00
7/31/2025	Timothy Burns	Participate in conference with J. Bair re case developments and revised insurance presentation (.2);	0.20	\$224.00
7/31/2025	Brian Cawley	Respond to T. Burns request regarding mediation summaries (.2);	0.20	\$110.00
7/31/2025	Jesse Bair	Review and edit further revised version of insurance strategy presentation (.3); participate in call with T. Burns re same and case developments (.2);	0.50	\$450.00
7/31/2025	Brian Cawley	Draft further revised version of omnibus Committee insurance presentation to incorporate feedback from state court counsel and Committee co-chairs (2.2);	2.20	\$1,210.00
7/31/2025	Jesse Bair	Review California case law re scope of bad faith damages and post-confirmation litigation (.2);	0.20	\$180.00
<b>Totals for Insurance Recovery Activities</b>			<b>90.60</b>	<b>\$69,746.00</b>

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<b>Total Hours and Fees</b>	<b>102.80</b>	<b>\$77,994.00</b>
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### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/18/2025	Delta Airlines, T. Burns (MSN-SFO, July 18-24)	\$918.37
07/21/2025	United Airlines, B. Cawley (MSN-SFO, July 21-23)	\$935.99
07/21/2025	Travel meal, B. Cawley	\$14.39
07/21/2025	Uber, B. Cawley (airport to hotel)	\$54.93
07/21/2025	Uber, B. Cawley (office to airport)	\$24.99
07/21/2025	Hotel, T. Burns (2 nights)	\$792.58
07/21/2025	Travel meal, T. Burns	\$21.73
07/23/2025	Travel meal, T. Burns	\$15.59
07/23/2025	Airport parking, T. Burns	\$20.00
07/23/2025	Travel meal, T. Burns	\$21.73
07/23/2025	Uber, B. Cawley (airport to home)	\$19.98
07/23/2025	Uber, B. Cawley (hotel to airport)	\$47.92

07/23/2025	Hotel, B. Cawley (2 nights)	\$792.58
07/30/2025	Postage	\$1.36
<b>Total Expenses</b>		<b>\$3,682.14</b>

#### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alexander Castro	Associate	6.00	\$470.00	\$2,820.00
Brenda Horn-Edwards	Paralegal	4.30	\$340.00	\$1,462.00
Brian Cawley	Associate	48.40	\$550.00	\$26,620.00
Jesse Bair	Partner	10.10	\$900.00	\$9,090.00
Karen Dempski	Paralegal	0.10	\$340.00	\$34.00
Timothy Burns	Partner	33.90	\$1,120.00	\$37,968.00

**Total Due This Invoice: \$81,676.14**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
Archbishop of San Francisco**

**Issue Date :** 9/17/2025

**Bill # :** 02024

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/1/2025	Brian Cawley	Participate in Committee meeting re case insurance strategy (1.6);	1.60	\$880.00
8/1/2025	Timothy Burns	Present omnibus insurance strategy presentation at full Committee meeting (1.6);	1.60	\$1,792.00
8/4/2025	Brian Cawley	Participate in state court counsel meeting re case insurance issues and negotiations (.6); participate in post-meeting conference with Committee professionals re outcome of same and next-steps (.2);	0.80	\$440.00
8/4/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re ongoing negotiations (.6); participate in post-meeting conference with Committee professionals re outcome of same and next-steps (.2);	0.80	\$720.00
8/5/2025	Jesse Bair	Prepare for Committee meeting (.2); participate in Committee meeting for insurance purposes re ongoing negotiations and strategy in connection with same (1.3);	1.50	\$1,350.00
8/5/2025	Jesse Bair	Participate in meeting with the Committee co-chairs re case developments and related strategy (.3);	0.30	\$270.00
8/5/2025	Brian Cawley	Participate in committee meeting for insurance purposes re ongoing negotiations and case strategy (1.3);	1.30	\$715.00
8/5/2025	Brian Cawley	Participate in meeting with the Committee co-chairs re case developments and related strategy (.3);	0.30	\$165.00
8/14/2025	Brian Cawley	Participate in Committee meeting re potential case insurance strategies (1.2);	1.20	\$660.00

8/14/2025	Timothy Burns	Present presentation re potential insurance strategies at Committee meeting (1.2);	1.20	\$1,344.00
8/19/2025	Brian Cawley	Participate in state court counsel meeting re case developments and insurance strategy (1.0);	1.00	\$550.00
8/19/2025	Timothy Burns	Participate in state court counsel meeting re case developments and insurance strategy (1.0);	1.00	\$1,120.00
8/22/2025	Brian Cawley	Participate in state court counsel meeting for insurance purposes re ongoing case negotiations (1.2);	1.20	\$660.00
8/27/2025	Jesse Bair	Participate in state court counsel meeting re Diocese counter and potential response (.5);	0.50	\$450.00
8/27/2025	Timothy Burns	Participate in state court counsel meeting re ongoing negotiations and potential counter response (.5) ;	0.50	\$560.00
8/28/2025	Brian Cawley	Participate in Committee meeting for insurance purposes re ongoing case negotiations and strategy (1.1);	1.10	\$605.00
8/28/2025	Timothy Burns	Participate in Committee meeting for insurance purposes re ongoing case negotiations and strategy (1.1);	1.10	\$1,232.00
<b>Totals for Committee Meetings</b>			<b>17.00</b>	<b>\$13,513.00</b>

#### **Fee Applications**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/19/2025	Jesse Bair	Review and respond to correspondence with Committee professionals re monthly fee statements (.2);	0.20	\$180.00
8/25/2025	Jesse Bair	Correspond with Committee professionals re interim fee hearing and potential adjournment of same (.1);	0.10	\$90.00
<b>Totals for Fee Applications</b>			<b>0.30</b>	<b>\$270.00</b>

#### **Insurance Recovery Activities**

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
8/1/2025	Brian Cawley	Revise and finalize insurance strategy presentation for upcoming Committee meeting (.8);	0.80	\$440.00
8/1/2025	Timothy Burns	Prepare for Committee meeting re case insurance strategy and presentation in connection with same (.8);	0.80	\$896.00
8/1/2025	Jesse Bair	Review and respond to correspondence with the mediators re continued insurance discussions and upcoming session (.2);	0.20	\$180.00
8/2/2025	Jesse Bair	Review insurance presentations in preparation for upcoming session (.2);	0.20	\$180.00
8/4/2025	Brian Cawley	Draft mediation summary memo for use in upcoming sessions (1.2);	1.20	\$660.00

8/4/2025	Jesse Bair	Prepare for upcoming mediation session, including detailed review of case insurance presentations, notes of prior sessions, and key case law (1.0); revise carrier claim counts and exposure assessments in connection with same (.2);	1.20	\$1,080.00
8/4/2025	Jesse Bair	Participate in call with B. Michael re mediation strategy and preparations (.5);	0.50	\$450.00
8/4/2025	Jesse Bair	Review and edit draft coverage complaint (.7);	0.70	\$630.00
8/4/2025	Jesse Bair	Review revised PSZJ presentation re ongoing negotiations for upcoming Committee meeting (.2);	0.20	\$180.00
8/4/2025	Brian Cawley	Analyze claim data and draft revised carrier claim count summary (1.3);	1.30	\$715.00
8/5/2025	Jesse Bair	Participate in Zoom mediation session re case insurance issues (1.2);	1.20	\$1,080.00
8/5/2025	Jesse Bair	Participate in call with Committee professionals re outcome of insurance mediation session and projects needed for completion in connection with outcome of same (.4);	0.40	\$360.00
8/5/2025	Brian Cawley	Participate in Zoom mediation session re case insurance issues (1.2);	1.20	\$660.00
8/5/2025	Brian Cawley	Participate in call with Committee professionals re outcome of insurance mediation session and next-steps in connection with outcome of same (.4);	0.40	\$220.00
8/6/2025	Jesse Bair	Review and edit debtor term sheet for insurance purposes (.8); review and respond to correspondence with PSZJ and the mediators re same (.2);	1.00	\$900.00
8/6/2025	Brian Cawley	Research re excess insurer duty to settle over defending primary insurer (1.8);	1.80	\$990.00
8/6/2025	Brian Cawley	Begin drafting Committee's aggregate insurance demand letter (1.4);	1.40	\$770.00
8/7/2025	Brian Cawley	Continue drafting Committee's aggregate insurance demand letter (2.5);	2.50	\$1,375.00
8/7/2025	Brian Cawley	Additional research re excess insurer bad faith and duty to settle issues (1.1);	1.10	\$605.00
8/7/2025	Karen Dempski	Docket/calendar motion hearing to approve compromise (.1);	0.10	\$34.00
8/8/2025	Jesse Bair	Participate in conference with B. Cawley re ongoing insurance projects and next-steps in light of insurance mediation session (.2);	0.20	\$180.00
8/8/2025	Brian Cawley	Participate in conference with J. Bair re case insurance projects and next-steps in light of insurance mediation session (.2);	0.20	\$110.00
8/8/2025	Brian Cawley	Finish drafting Committee aggregate insurance demand letter (2.9);	2.90	\$1,595.00
8/9/2025	Jesse Bair	Review final version of lift stay stipulation, motion in support of same, and related exhibits (.2);	0.20	\$180.00
8/11/2025	Timothy Burns	Conference with B. Michael re mediation and insurance issues (.4);	0.40	\$448.00



8/11/2025	Jesse Bair	Review correspondence with the mediators and debtor re mediation meeting (.1);	0.10	\$90.00
8/11/2025	Brian Cawley	Draft additional presentation re potential insurance strategies for upcoming Committee meeting (3.2);	3.20	\$1,760.00
8/12/2025	Timothy Burns	Review correspondence from state court counsel re case insurance issues and California insurance decision in connection with same (.2);	0.20	\$224.00
8/12/2025	Timothy Burns	Review and respond to correspondence with BB team re Committee insurance presentation (.2);	0.20	\$224.00
8/12/2025	Timothy Burns	Review and revise draft presentation re potential additional insurance strategies for upcoming Committee meeting (.8);	0.80	\$896.00
8/12/2025	Timothy Burns	Review and revise the Committee's aggregate demand letter (.4);	0.40	\$448.00
8/13/2025	Brian Cawley	Draft revised version of insurance strategy presentation to incorporate T. Burns' suggested revisions (1.6);	1.60	\$880.00
8/13/2025	Jesse Bair	Review and edit insurance strategy presentation to the Committee (.1);	0.10	\$90.00
8/14/2025	Timothy Burns	Prepare for Committee meeting re presentation of potential additional case insurance strategies (.6);	0.60	\$672.00
8/14/2025	Timothy Burns	Participate in calls with Committee professionals and state court counsel re outcome of Committee meeting and next-steps re case insurance issues (.6);	0.60	\$672.00
8/15/2025	Timothy Burns	Review and respond to correspondence with B. Michael re conference re case developments (.2);	0.20	\$224.00
8/15/2025	Timothy Burns	Review and respond to correspondence with state court counsel re Howard case (.2);	0.20	\$224.00
8/16/2025	Jesse Bair	Review revised version of insurance strategy presentation to the Committee and related correspondence with Committee professionals re same (.2);	0.20	\$180.00
8/18/2025	Timothy Burns	Participate in call with Committee counsel re case insurance strategy (1.0);	1.00	\$1,120.00
8/18/2025	Timothy Burns	Participate in call with state court counsel re lift stay cases (.3); conference with B. Cawley re same (.2);	0.50	\$560.00
8/18/2025	Brian Cawley	Participate in call with Committee counsel re case insurance strategy (1.0);	1.00	\$550.00
8/18/2025	Brian Cawley	Conference with T. Burns re lift stay cases and related insurance issues (.2);	0.20	\$110.00
8/18/2025	Brian Cawley	Review and respond to T. Burns questions re punitive damage insurance issues (.4);	0.40	\$220.00
8/18/2025	Jesse Bair	Review correspondence with Committee professionals re insurance strategy proposal (.1);	0.10	\$90.00
8/18/2025	Timothy Burns	Participate in call with state court counsel re insurance strategy (.6);	0.60	\$672.00
8/18/2025	Timothy Burns	Review and edit draft demand (.2);	0.20	\$224.00
8/19/2025	Timothy Burns	Participate in Zoom mediation session with debtor re case insurance issues (.4);	0.40	\$448.00



8/19/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re lift stay cases (.2);	0.20	\$224.00
8/19/2025	Jesse Bair	Prepare for insurance mediation Zoom session (.3); participate in insurance mediation Zoom session (.4);	0.70	\$630.00
8/20/2025	Jesse Bair	Prepare for upcoming Committee meeting and mediation session by assessing insurance demand issues and related insurance strategy (.2);	0.20	\$180.00
8/20/2025	Timothy Burns	Assess insurance issues in connection with lift stay cases (.2); participate in call with state court counsel re same (.2); participate in call with B. Michael re same (.1);	0.50	\$560.00
8/20/2025	Timothy Burns	Review and respond to correspondence with B. Michael re upcoming Committee meeting (.2);	0.20	\$224.00
8/20/2025	Brian Cawley	Respond to T. Burns request re insurance issues in connection with lift stay cases (.2);	0.20	\$110.00
8/21/2025	Jesse Bair	Review the insurers' objection to the lift stay motion (.6);	0.60	\$540.00
8/22/2025	Brian Cawley	Draft summary re outcome and key take-aways from state court counsel meeting (.3);	0.30	\$165.00
8/22/2025	Jesse Bair	Review B. Cawley summary and related correspondence re outcome of state counsel meeting (.2); review and respond to correspondence with the mediators re upcoming sessions (.1);	0.30	\$270.00
8/25/2025	Timothy Burns	Participate in calls with state court counsel re insurance strategy re mediation (1.2);	1.20	\$1,344.00
8/25/2025	Timothy Burns	Conference with J. Bair re insurance strategy re mediation and review correspondence with the Committee re upcoming mediation (.2);	0.20	\$224.00
8/25/2025	Timothy Burns	Participate in call with the mediators and Committee professionals re ongoing negotiations and preparations for next session (.5);	0.50	\$560.00
8/25/2025	Jesse Bair	Participate in call with the mediators re ongoing negotiations and upcoming session (.5);	0.50	\$450.00
8/25/2025	Jesse Bair	Review correspondence with Committee professionals and the Committee re mediation developments and conference with T. Burns re same and insurance strategy (.2);	0.20	\$180.00
8/26/2025	Brian Cawley	Begin legal research and factual analysis in connection with responding to the insurers' lift stay objections (1.3);	1.30	\$715.00
8/26/2025	Jesse Bair	Continue analyzing the insurers' lift stay objection and draft outline re insurance-related responses to same (1.2);	1.20	\$1,080.00
8/26/2025	Jesse Bair	Participate in call with Committee professionals re lift stay reply brief strategy (.5);	0.50	\$450.00
8/26/2025	Brian Cawley	Respond to T. Burns request regarding debtor's motion to approve compromise (.2);	0.20	\$110.00

8/26/2025	Timothy Burns	Review and analysis of insurers' lift stay objection, including memo to file re same (1.1);	1.10	\$1,232.00
8/26/2025	Timothy Burns	Participate in conference with Committee professionals re the insurers' lift stay objection and reply to same (.5);	0.50	\$560.00
8/26/2025	Timothy Burns	Correspondence with Committee counsel re lift stay briefing (.4); correspondence with Debtor's counsel re same (.1);	0.50	\$560.00
8/27/2025	Timothy Burns	Review recent bankruptcy court decision re insurance issues relating to potential plan structures (.2);	0.20	\$224.00
8/27/2025	Jesse Bair	Participate in call with the mediators re Diocese counter, ongoing negotiations, and upcoming session (.5); participate in follow-up call with Committee professionals re same and potential response (.3);	0.80	\$720.00
8/27/2025	Jesse Bair	Review and edit draft insurance section of the Committee's reply to the insurers' lift stay opposition (1.6);	1.60	\$1,440.00
8/27/2025	Timothy Burns	Review and respond to internal correspondence and correspondence with PSZJ re lift stay briefing (.2);	0.20	\$224.00
8/27/2025	Brian Cawley	Participate in call with mediators regarding ongoing negotiations (.5);	0.50	\$275.00
8/27/2025	Brian Cawley	Participate in call with Committee professionals re outcome of mediator meeting and next-steps in connection with same (.3);	0.30	\$165.00
8/27/2025	Brian Cawley	Draft insurance-related portions of the Committee's reply to the Insurers' lift stay objections (3.8);	3.80	\$2,090.00
8/28/2025	Timothy Burns	Review and respond to correspondence from Debtor re mediation (.2);	0.20	\$224.00
8/28/2025	Timothy Burns	Review and revise lift stay reply brief (.4);	0.40	\$448.00
8/28/2025	Jesse Bair	Review and edit revised draft of the Committee's reply in support of lift stay stipulation (.3);	0.30	\$270.00
8/28/2025	Jesse Bair	Participate in call with state court counsel re mediation strategy and upcoming session (.2);	0.20	\$180.00
8/28/2025	Jesse Bair	Review the debtor's reply brief in support of the lift stay stipulation and supporting exhibits (.3);	0.30	\$270.00
8/29/2025	Jesse Bair	Review and respond to correspondence with Committee professionals and state court counsel re insurance lift stay issues and upcoming mediation session (.2);	0.20	\$180.00
8/29/2025	Timothy Burns	Review correspondence with state court counsel and Committee professionals re JCCP proceeding (.2);	0.20	\$224.00
8/31/2025	Jesse Bair	Review the debtor's status conference statement (.1);	0.10	\$90.00
<b>Totals for Insurance Recovery Activities</b>			<b>55.30</b>	<b>\$42,888.00</b>

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**Total Hours and Fees**

**72.60**

**\$56,671.00**

### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brian Cawley	Associate	36.30	\$550.00	\$19,965.00
Jesse Bair	Partner	17.60	\$900.00	\$15,840.00
Karen Dempski	Paralegal	0.10	\$340.00	\$34.00
Timothy Burns	Partner	18.60	\$1,120.00	\$20,832.00

**Total Due This Invoice: \$56,671.00**

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
Archbishop of San Francisco**

**Issue Date :** 10/17/2025

**Bill # :** 02055

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/16/2025	Brian Cawley	Participate in state court counsel meeting for insurance purposes re case developments and next-steps (.8);	0.80	\$440.00
9/16/2025	Timothy Burns	Participate in portion of state court counsel meeting for insurance purposes (.7);	0.70	\$784.00
9/18/2025	Brian Cawley	Participate in Committee meeting for insurance purposes (1.1);	1.10	\$605.00
9/18/2025	Timothy Burns	Participate in Committee meeting for insurance purposes re case developments and next-steps (1.1);	1.10	\$1,232.00
9/22/2025	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case strategy (.6);	0.60	\$672.00
9/22/2025	Jesse Bair	Participate in state court counsel meeting for insurance purposes re mediation developments and strategy (.6);	0.60	\$540.00
9/26/2025	Timothy Burns	Participate in Committee meeting re mediation issues (.9);	0.90	\$1,008.00
9/26/2025	Brian Cawley	Participate in Committee meeting for insurance purposes re mediation issues (.9);	0.90	\$495.00
<b>Totals for Committee Meetings</b>			<b>6.70</b>	<b>\$5,776.00</b>

### Fee Applications

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/2/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and certificate of service (.2); correspond with J. Bair (.1);	0.30	\$102.00
9/2/2025	Brenda Horn-Edwards	File and serve Burns Bair monthly professional fee statement (.2);	0.20	\$68.00

9/10/2025	Jesse Bair	Review fee examiner's final report re 5th interim applications and correspond with B. Horn-Edwards re preparing proposed Order granting same (.2);	0.20	\$180.00
9/11/2025	Jesse Bair	Review docket order approving interim fee applications, review and edit proposed Order granting same, and correspond with fee examiner and B. Horn-Edwards re same (.3);	0.30	\$270.00
9/11/2025	Brenda Horn-Edwards	Lodge proposed order re Burns Bair fifth interim fee application with Court and correspond with J. Bair re same (.2);	0.20	\$68.00
9/30/2025	Brenda Horn-Edwards	Draft monthly professional fee statement and certificate of service (.2); correspond with J. Bair (.1);	0.30	\$102.00
9/30/2025	Brenda Horn-Edwards	File and serve Burns Bair monthly professional fee statement (.2);	0.20	\$68.00
9/30/2025	Jesse Bair	Review and edit monthly fee statement (.1);	0.10	\$90.00
<b>Totals for Fee Applications</b>			<b>1.80</b>	<b>\$948.00</b>

### Hearings

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/4/2025	Jesse Bair	Attend status conference for insurance purposes (.7);	0.70	\$630.00
<b>Totals for Hearings</b>			<b>0.70</b>	<b>\$630.00</b>

### Insurance Recovery Activities

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
9/1/2025	Brian Cawley	Revise and update aggregate insurance demand (1.5);	1.50	\$825.00
9/2/2025	Jesse Bair	Review Court's docket order granting lift stay motion and related correspondence with Committee professionals and the Committee re same and additional case developments (.2);	0.20	\$180.00
9/2/2025	Timothy Burns	Review court order re lift stay and demand letters (.1); correspondence with Committee professionals re same (.2);	0.30	\$336.00
9/2/2025	Timothy Burns	Review correspondence with Committee professionals and the Committee re mediation issues (.2);	0.20	\$224.00
9/2/2025	Timothy Burns	Review Debtor's 9/4/25 status conference statement (.1); review correspondence with the Committee and debtor re mediation issues (.2);	0.30	\$336.00
9/2/2025	Timothy Burns	Prepare for upcoming mediation session (.9);	0.90	\$1,008.00

9/3/2025	Timothy Burns	Participate in mediation session (6.0); participate in post-session conference with Committee professionals re outcome, strategy, and next-steps (.4);	6.20	\$6,944.00
9/3/2025	Jesse Bair	Prepare for mediation session (.2); participate in full-day mediation session for insurance purposes (6.0); participate in post-session conference with Committee professionals re outcome of same, next-steps, and strategy (.4);	6.60	\$5,940.00
9/4/2025	Brian Cawley	Draft summary of status conference outcome (.2);	0.20	\$110.00
9/10/2025	Timothy Burns	Analysis re insurance demand strategy issues and brief review of research memo in connection with same (.3);	0.30	\$336.00
9/10/2025	Jesse Bair	Analyze consequential damages / bad faith law in connection with ongoing negotiations (.3);	0.30	\$270.00
9/16/2025	Brian Cawley	Draft summary re outcome and key takeaways from state court counsel meeting (.2);	0.20	\$110.00
9/16/2025	Timothy Burns	Conference with J. Bair re outcome of state court counsel meeting and related insurance strategy (.2); participate in additional call with state court counsel re case insurance and mediation strategy (.2);	0.40	\$448.00
9/16/2025	Jesse Bair	Review summary re outcome of state court counsel meeting and conference with T. Burns re same and mediation next-steps (.2);	0.20	\$180.00
9/17/2025	Jesse Bair	Review the insurers' motion for stay pending appeal of lift stay ruling and notice of appeal (.4); review and respond to correspondence with the debtor, insurers, and Committee professionals re same and briefing issues (.2);	0.60	\$540.00
9/17/2025	Jesse Bair	Review correspondence with Committee professionals re mediation developments (.1);	0.10	\$90.00
9/17/2025	Timothy Burns	Review correspondence with the Debtor and Committee professionals re the insurers' stay pending appeal motion (.2);	0.20	\$224.00
9/17/2025	Timothy Burns	Review Insurers' Motion to Stay Pending appeal (.4); review correspondence with Committee professionals re upcoming Committee meeting (.1);	0.50	\$560.00
9/18/2025	Timothy Burns	Participate in meet and confer with the insurers and debtor re stay pending appeal issues (.3); participate in post-meet and confer conference with the debtor re outcome of same and next-steps (.3);	0.60	\$672.00

9/18/2025	Timothy Burns	Participate in conference with Committee professionals re stay pending appeal and other lift stay appellate issues (.5);	0.50	\$560.00
9/18/2025	Timothy Burns	Brief review of revised draft insurance demand letter template (.2); review and respond to correspondence with Committee professionals re same (.2);	0.40	\$448.00
9/18/2025	Timothy Burns	Review and respond to B. Michael correspondence re insurance demands (.2);	0.20	\$224.00
9/18/2025	Timothy Burns	Review J. Stang's comments on the insurers' motion for stay pending appeal and related correspondence re appeal stay briefing with the debtor and Committee professionals (.3);	0.30	\$336.00
9/18/2025	Jesse Bair	Participate in meet and confer with the insurers re lift stay appeal and stay issues (.3); participate in post-meet and confer conference with the debtor and Committee professionals re same and potential response to the insurers' proposal (.3); participate in conference with Committee professionals re same and strategy re opposing the insurers' motion for stay (.5);	1.10	\$990.00
9/18/2025	Brian Cawley	Review and revise insurance demand letter template (.5);	0.50	\$275.00
9/19/2025	Jesse Bair	Review and respond to various correspondence with the debtor, insurers, and Committee professionals re lift stay appeal and stay issues and the insurers' proposal re same (.4);	0.40	\$360.00
9/22/2025	Timothy Burns	Review and respond to B. Michael correspondence re Committee and state court counsel meetings (.1);	0.10	\$112.00
9/22/2025	Timothy Burns	Review various correspondence correspondence with Committee professionals, the Committee, and state court counsel re mediation issues (.3);	0.30	\$336.00
9/22/2025	Timothy Burns	Review Century's notice of appeal (.1);	0.10	\$112.00
9/22/2025	Timothy Burns	Review and respond to correspondence with J. Bair re CNA meet and confer re stay pending appeal requests (.2);	0.20	\$224.00
9/22/2025	Jesse Bair	Participate in call with CNA re lift stay appeal issues (.3); follow-up correspondence with Committee professionals re same and next-steps (.3);	0.60	\$540.00
9/22/2025	Jesse Bair	Review correspondence with the Committee professionals, the Committee, and state court counsel re mediation developments (.2);	0.20	\$180.00
9/24/2025	Brian Cawley	Respond to J. Bair request re insurer demands (.2);	0.20	\$110.00



9/25/2025	Brian Cawley	Continue reviewing and revising insurance demand letters (1.1);	1.10	\$605.00
9/26/2025	Jesse Bair	Review and edit the Committee's response to the insurers' motion to stay lift stay order (1.2);	1.20	\$1,080.00
9/26/2025	Timothy Burns	Review and respond to correspondence with Committee professionals re mediation and related Committee meeting (.3);	0.30	\$336.00
9/26/2025	Brian Cawley	Finish drafting revised version of insurance demand letter templates (2.4);	2.40	\$1,320.00
9/26/2025	Timothy Burns	Participate in conference with B. Michael re insurance demand letters (.4); review correspondence from B. Cawley re same (1.);	0.50	\$560.00
9/29/2025	Jesse Bair	Review T. Burns' suggested edits to the Committee's response to the insurers' motion to stay (.1);	0.10	\$90.00
9/29/2025	Timothy Burns	Review and revise draft response brief re motion to stay pending appeal (.8);	0.80	\$896.00
9/30/2025	Timothy Burns	Review correspondence with the Committee professionals and state court counsel re mediation issues (.1);	0.10	\$112.00
9/30/2025	Timothy Burns	Review final version of opposition to motion to stay pending appeal (.2);	0.20	\$224.00
9/30/2025	Jesse Bair	Review final version of the Committee's opposition to the insurers' motion for stay (.2); review the debtor's opposition to same (.3);	0.50	\$450.00
9/30/2025	Jesse Bair	Review the insurers' statement of issues on appeal and record designations (.2);	0.20	\$180.00
<b>Totals for Insurance Recovery Activities</b>			<b>32.30</b>	<b>\$29,993.00</b>
<b>Total Hours and Fees</b>			<b>41.50</b>	<b>\$37,347.00</b>

#### EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/02/2025	Delta Airlines, J. Bair (MSN-SFO, Sept. 2-3)	\$998.37
09/02/2025	Delta Airlines, T. Burns (MSN-SFO, Sept. 2)	\$669.18
09/02/2025	Postage	\$1.07
09/03/2025	Taxi, J. Bair and T. Burns (airport to hotel)	\$107.92
09/03/2025	Travel meal, J. Bair	\$30.58
09/03/2025	Uber, J. Bair (hotel to airport)	\$73.53
09/04/2025	United Airlines, T. Burns (SFO-MSN, Sept. 5)	\$506.74
09/04/2025	Hotel, T. Burns (2 nights)	\$852.00
09/04/2025	Hotel, J. Bair (1 night)	\$501.31
09/04/2025	Uber, T. Burns (hotel to airport)	\$138.34



09/04/2025	MSN Airport Parking, T. Burns	\$26.00
09/04/2025	MSN Airport Parking, J. Bair	\$20.00
09/04/2025	Travel meal, T. Burns	\$39.11
09/30/2025	Postage	\$1.36
<b>Total Expenses</b>		<b>\$3,965.51</b>

#### Timekeeper Summary

<u>Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brenda Horn-Edwards	Paralegal	1.20	\$340.00	\$408.00
Brian Cawley	Associate	8.90	\$550.00	\$4,895.00
Jesse Bair	Partner	14.20	\$900.00	\$12,780.00
Timothy Burns	Partner	17.20	\$1,120.00	\$19,264.00

**Total Due This Invoice: \$41,312.51**